



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Missouri Department of Natural Resources
Implementation Impact Report
for
Marginal Nonattainment Area Plan for the Missouri Portion of the
St. Louis Nonattainment Area for the 2015 Ozone Standard

Pursuant to Section 640.090 RSMo, the Missouri Department of Natural Resources (Department) has prepared this implementation impact report (IIR) in lieu of a regulatory impact report required by Section 640.015, RSMo. An IIR is required for all state implementation plans (SIPs), including new and revised plans that address National Ambient Air Quality Standard nonattainment areas under the federal Clean Air Act (CAA), as well as state plans to comply with federal regulations relating to carbon emissions. The Department is submitting the proposed SIP and IIR to the Governor, the Joint Committee on Government Accountability, the President Pro Tempore of the Senate, and the Speaker of the House of Representatives. The Department will post the IIR and the proposed SIP prominently on the home page of its website 45 calendar days prior to submission to the U.S. Environmental Protection Agency (EPA). If the Department revises the IIR or SIP, the Department will provide an updated report and plan to all the entities listed above and provide the final documents on the Department website for at least a year after submission to EPA.

Pursuant to Section 640.090, RSMo, the Department prepared this IIR in collaboration with its Division of Energy, the Missouri Department of Health and Senior Services, the Missouri Department of Revenue, the Public Service Commission, and the Missouri Department of Conservation. The following statements detail the responses to the required criteria, listed below, from Section 640.090 2. RSMo.

1. The economic impact the plan will have on businesses and citizens in the state, including any disproportionate impact it will have on lower income populations, and any job losses or gains that are anticipated as a result of the plan, rule, or regulation;

This SIP has no additional economic impact on businesses or citizens in Missouri, and no job losses or gains are anticipated. Currently, and prior to this SIP action, businesses in Missouri are subject to air-permit and emission-reporting requirements that have been in place for many years. This plan continues those requirements and does not change which types of businesses are subject to them. No new regulations on business or industrial activities, emission-reporting requirements, or permitting actions are required as a result of this SIP action.

2. The existence and cost efficiency of any technology that may be needed to achieve the reduction goal and whether the reduction goals are achievable within the allotted time frame;

This SIP does not contain additional emission reduction goals, therefore no new

technology is needed.

3. Whether the plan achieves reduction goals at a sustainable cost;

This SIP does not contain additional emission reduction goals, therefore there is no cost to public or private entities.

4. The remaining useful life of any emitting structure affected by the plan if provided by the emitting entity;

This SIP does not require changes at any emitting structure, so there is no impact on remaining useful life as a result of this SIP.

5. Any existing depreciation schedules of an emitting structure that will be forced into early retirement due to implementation of the plan if provided by the emitting entity;

This SIP does not require changes at any emitting structures, and therefore no early retirement is caused or required by this SIP.

6. Any policy options for the adoption of less stringent standards or longer compliance schedules;

This SIP does not contain any new standards or compliance schedules, therefore alternate standards or schedules were not evaluated. The Department notes, however, that the standards governing all SIPs are required by federal law and therefore less stringent standards are not an option.

7. The potential impact on taxes and the general revenue of the state;

This SIP has no impact on taxes or general revenue.

8. The potential impact on citizen health, including any evidence that the pollutant contributes to health problems based upon peer-reviewed scientific evidence;

This SIP does not contain any emission reduction goals or new requirements for emitting sources. Therefore, it has no impact on citizen health. Citizen health related to ground-level ozone exposure continues to be addressed through existing permitting and emission-control requirements.

9. Options, to the maximum extent allowable, that provide flexibility in achieving reduction goals, including the averaging of emissions or any other alternative implementation measure that may further the interests of Missouri's citizens;

This SIP does not contain emission reduction goals, therefore no alternative options were evaluated.

10. A cost-benefit analysis of how the plan affects the economic well-being of the state, as well as the projected cost or benefits to any industry affected by the plan, and projected costs or benefits to consumers and citizens;

This SIP does not contain any emission reduction goals or new requirements for emitting sources. Therefore, the SIP will not result in any new costs or benefits to any industries in the state or any consumers or citizens.

11. The potential impact of the plan on generation, supply, distribution, and service reliability;

This SIP has no impact on electric generation, supply, distribution or service reliability.

12. The elements of a regulatory impact report as required under Section 640.015;

(1) A report on the peer-reviewed scientific data used to commence the rulemaking process;

This SIP does not include any rulemakings or new requirements for sources in the state.

(2) A description of persons who will most likely be affected by the proposed rule, including persons that will bear the costs of the proposed rule and persons that will benefit from the proposed rule;

This SIP does not include any rulemakings or new requirements for sources in the state. There are no new costs or benefits associated with the SIP.

(3) A description of the environmental and economic costs and benefits of the proposed rule;

This SIP does not include any rulemakings or new requirements for sources in the state. There are no new costs or benefits associated with the SIP.

(4) The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenue;

This SIP does not include any rulemakings or new requirements for sources in the state. There are no new agency costs or anticipated effects on state revenue.

(5) A comparison of the probable costs and benefits of the proposed rule to the probable costs and benefits of inaction, which includes both economic and environmental costs and benefits;

This SIP does not include any rulemakings or new requirements for sources in the state. This SIP is administrative in nature, and will result in no new costs or benefits.

(6) A determination of whether there are less costly or less intrusive methods for achieving the proposed rule;

This SIP does not include any rulemakings or new requirements for sources in the state. There are no new costs or benefits associated with the SIP.

(7) A description of any alternative method for achieving the purpose of the proposed rule that were seriously considered by the department and the reasons why they were rejected in favor of the proposed rule;

This SIP does not include any rulemakings or new requirements for sources in the state. The SIP is required by the federal Clean Air Act.

(8) An analysis of both short-term and long-term consequences of the proposed rule;

This SIP does not include any rulemakings or new requirements for sources in the state. Therefore, the SIP is not expected to result in any short-term or long-term consequences.

(9) An explanation of the risks to human health, public welfare, or the environment addressed by the proposed rule;

This SIP does not include any rulemakings or new requirements for sources in the state. Therefore, it has no impact on human health, public welfare, or the environment. The health and environmental risks related to ground-level ozone exposure continue to be addressed through existing permitting and emission-control requirements.

(10) The identification of the sources of scientific information used in evaluating the risk and a summary of such information;

This SIP does not include any rulemakings or new requirements for sources in the state. Therefore, no risks were evaluated in the preparation of this SIP. The health and environmental risks related to ground-level ozone exposure continue to be addressed through existing permitting and emission-control requirements.

(11) A description and impact statement of any uncertainties and assumptions made in conducting the analysis on the resulting risk estimate;

This SIP does not include any rulemakings or new requirements for sources in the state. Therefore, no risks were evaluated in the preparation of this SIP. The health and environmental risks related to ground-level ozone exposure continue to be addressed through existing permitting and emission-control requirements.

(12) A description of any significant countervailing risks that may be caused by the proposed rule; and

This SIP does not include any rulemakings or new requirements for sources in the state, therefore no countervailing risks are anticipated.

(13) The identification of at least one, if any, alternative regulatory approaches that will produce comparable human health, public welfare, or environmental outcomes.

This SIP does not include any rulemakings or new requirements for sources in the state. The SIP is required by the federal Clean Air Act.

13. Information, to the extent that it is available, regarding how other states are formulating their plans.

Clean Air Act Section 182(a) includes the SIP-related requirements for nonattainment area plans. In December 2018 EPA promulgated the rule governing requirements for nonattainment area SIPs for the 2015 ozone standard.¹ Other states with marginal nonattainment areas under this standard, including Illinois for their portion of the St. Louis nonattainment area, are expected to submit SIPs very similar to Missouri's.

¹ 83 FR 62998, December 6, 2018